

CORRES CONTROL  
INCOMING LTR NO

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET SUITE 500  
DENVER COLORADO 80202 2466

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 SEP 21 10 05  
 ROCKY FLATS  
 CORRE PROG
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DATE

Ref 8HWM FF

SEP 16 1994

## ACTION

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Mr Steve Slaten  
 Department of Energy  
 Rocky Flats Office  
 P O Box 928  
 Golden Colorado 80402 0928

RE Operable Unit No 1 Hot Spot Removal  
 Final Proposed Action Memorandum (PAM),  
 Responsiveness Summary, and  
 Final Sampling and Analysis Plan

Dear Mr Slaten

The final version of the OU 1 PAM shows no real change in overall cost for the hot spot removal activity other than leaving out the estimated waste characterization cost of >\$150 000. Although cost is not EPA's primary criteria for determining approval of remedial actions it is a consideration when DOE's ability to perform required activities is impacted due to inefficient spending. The breakdown of costs shown on page 34 of the PAM lists \$75,600 for project management and \$31 000 for reporting, both of which are excessive for such a limited and simple action. If these costs are due to organizational requirements of DOE and/or its contractors such requirements need to be evaluated and made more efficient.

The argument that "conducting work at a DOE weapons installation is necessarily more expensive than at other sites" should not hold true across the board and DOE must attempt to bring down its cost of doing business. Additionally in DOE's responsiveness summary this action was likened to a "time critical removal action". Such a comparison does not fit these circumstances, where the removal is proposed to occur more than two years after the hot spots were detected.

In response to EPA's comment requiring further evaluation of capping the hot spots, DOE's Responsiveness Summary states that "capping is not consistent with the final remedy for OU 1" and "remediation of these (OU 1 surface) soils is not required as long as the hot spots are removed". Together these statements indicate that DOE has unilaterally decided that the final remedy for OU 1 surface soils is no action. This is totally unacceptable and it is an obvious attempt to do as little as possible while claiming that such limited actions remove all unacceptable risk from this media.

EPA and CDPHE have previously agreed to DOE's proposal that remedial alternatives for OU 1 surface soils be evaluated with OU

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ADMN RECORD/080  
PATS/T130GReviewed for Addressee  
Corres Control RFP9-21-94  
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DOE ORDER # 5400.1

ADMIN RECORD

A-DU01-000699

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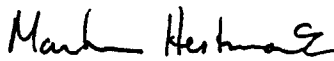
2, since these soils are actually one continuous area of radionuclide contamination, most of which lies in OU 2. As per this agreement, OU 1 and 2 surface soils must be fully evaluated through the development and screening of Corrective/Remedial Alternatives as described in part IX of the IAG Statement of Work. Since this evaluation has not yet been performed, it is premature to state that capping the hot spots is inconsistent with the final remedy for OU 1. As previously stated, temporary caps could be placed over the hot spots at very little expense until the final remedy for these soils is agreed upon. The remedial action then used to address the much greater volume of surface soils at OUs 1 and 2 could also be used to remediate these hot spots at minimal incremental cost.

On page 16 of the PAM, it is stated that the radiological surveys conducted in 1992 and 1993 failed to detect the hot spots that were first identified in 1987 by soil sampling. Since both the FIDLER and HPGe instruments were used to survey the area where these hot spots are located, EPA has concerns about these instruments and how they are used in the field. It is understood that the HPGe can discern isotope specific energies. Therefore, DOE should be able to calculate the HPGe minimum detectable activities for specific isotopes using the necessary assumptions for contaminant depth, point source or widely disseminated occurrence, count time and instrument configuration. This information must be submitted to EPA (expressed in picoCuries per gram) so that all parties can fully understand the usefulness of HPGe surveys for this and future actions.

EPA's previous comments noted that there was no radionuclide analysis listed for characterization samples according to Table 3.1 in the draft Sampling and Analysis Plan. The table has been revised but incorrectly, since it now shows no plutonium analysis of the confirmation samples and no americium, uranium or gross alpha, beta and gamma analysis for characterization samples. Both sets of samples need all of the above radionuclide analyses.

In summary, EPA is approving the Hot Spot Removal as described in the PAM and Sampling and Analysis Plan but not without the concerns as stated above. If you have any questions regarding these matters, please contact Gary Kleeman of my staff at 294 1071.

Sincerely,

  
Martin Hestmark, Manager  
Rocky Flats Project